

Site 309 – Strategic Expansion of Marden – Land North of Marden - Firmin Countryside Proposal

Factual Errors

Please find below a referenced list of the factual errors that are contained within the recent call for sites submission from Firmin and Countryside properties for land north of the railway line in Marden. We would like these errors to be taken into account when this site is being assessed for suitability for development. We intend these page referenced factual inaccuracies to be read alongside our technical document which factually documents the reasoning behind why this site is unsuitable, along with including the previous site suitability assessment from Maidstone Borough Council where the site was factually assessed and rated unsuitable for development in 2016. A final point of note is that since the original masterplan was produced, the green area of open space in the proposal has already shrunk and further land is taken up by housing allocation on the plan.

Submission Form

Page 3 No. 22 – ‘N/A’ written against ‘Relevant planning history’ but there are two:

HO-151 and 16/504584/OUT, please see the further information in our technical document.

Applicants Letter

The letter from Mr G Carpenter confirming that he is the owner of part of the land in the submission has not been dated.

Heritage Report

Page 5 The map’s yellow areas are annotated ‘Consented but not yet constructed’ development, this is inaccurate as the majority of these have been built and the map does not show the full extent of the recent Marden developments either.

Landscape and Visual Appraisal

Within this appraisal the landscape is characterised referencing the 121 Low Weald characteristics produced by Natural England whilst simultaneously stating elsewhere throughout the submission (vision document page 11) that it is not in the Low Weald character area.

Ecology Report

Birds 3.3.10 During the Phase I survey, the following bird species were recorded, as shown in the following table. The hedgerows on the field boundaries across the whole Site provide suitable habitat for breeding birds.

Black-headed gull	<i>Chroicocephalus ridibundus</i>	Jay	<i>Garrulus glandarius</i>
Blackbird	<i>Turdus merula</i>	Linnet *	<i>Linaria cannabina</i>
Blackcap	<i>Sylvia atricapilla</i>	Little grebe	<i>Tachybaptus ruficollis</i>
Blue tit	<i>Cyanistes caeruleus</i>	Long-tailed tit	<i>Aegithalos caudatus</i>
Bullfinch	<i>Pyrrhula pyrrhula</i>	Magpie	<i>Pica pica</i>
Buzzard	<i>Buteo buteo</i>	Moorhen	<i>Gallinula chloropus</i>
Coot	<i>Fulica atra</i>	Nightingale *	<i>Luscinia megarhynchos</i>
European crow	<i>Corvus corone</i>	Pied wagtail	<i>Motacilla alba</i>
Goldcrest	<i>Regulus regulus</i>	Skylark *	<i>Alauda arvensis</i>
Goldfinch	<i>Carduelis carduelis</i>	Song thrush *	<i>Turdus philomelos</i>
Great tit	<i>Parus major</i>	Spotted Flycatcher*	<i>Muscicapa Striata</i>
Great spotted woodpecker	<i>Dendrocopos major</i>	Stock dove	<i>Columba oenas</i>

Green woodpecker <i>Picus viridis</i>	Tree creeper <i>Certhia familiaris</i>
Herring gull <i>Larus argentatus</i>	Turtle dove * <i>Streptopelia turtur</i>
House martin <i>Delichon urbicum</i>	Wood pigeon <i>Columba palumbus</i>
House sparrow * <i>Passer domesticus</i>	Wren <i>Troglodytes troglodytes</i>
	Yellowhammer * <i>Emberiza citrinella</i>

*RSPB Red List Species

The conclusion of this report identifies that further bird surveys are required. However, further bird surveys exist that have been completed by the RSPB and which are attached to this email.

The RSPB are prepared to get further involved with protecting this site given the number of red listed bird species that are recorded as either living on the site or utilising the site for their needs.

4.1.10 References the Marden Neighbourhood Plan dated June 2018 and policy B1. This policy has since been superseded in subsequent drafts of the neighbourhood plan by policy NE3 Landscape Integration.

Transport Report

Page 14: 1.6.6 We dispute that Southeastern have agreed to this in principle, given their concerns that they have detailed in the email released by means of an FOI request and attached to this email, which are referred to in the Network Rail letter.

Vision Document

Page 13: 4.1 Marden no longer has a Post Office with retail provision. There is a Post Office facility within a retail store.

Page 14: 4.2 There are 129 listed buildings in Marden, not the 119 stated.

Page 15 The map's yellow areas are annotated 'Consented but not yet constructed' development, this is inaccurate as the majority of these have been built and the map does not show the full extent of recent developments in Marden.

Page 16 At the top of column two, it is written, "The Parish state that they need houses.....". Marden Parish Council and Mark Egerton (strategic planning manager at MBC) have confirmed that the sentence in the Marden Neighbourhood Plan from which this was inferred in fact refers to a need for houses in the SE region, not in the village.

Page 17 The map caption states that there is a 'lack of landscape and heritage constraints north of the railway.' There are a number of heritage assets north of the railway – notably The Old Vicarage, Church Farm House and the Oasthouse, but many more besides.

Page 18 05 Our Vision Retained arable land and retained orchards are indicated on the plan. The retained arable land is currently being planted up as intensive orchards. These are located in the areas of green open spaces on the NE of the site, however as these are commercial enterprises of highly intensive top fruit production including associated rows of wirework this area will not facilitate open access. This area of top fruit production was used as justification for the permitted development of the new agricultural barn on Battle Lane planning reference 18/502762/AGRIC, although now not included in the area of the site the surrounding land was used to justify its construction. Also, the Highwood Green housing development is not depicted on the plan.

Page 20 The existing settlement confines plan does not have Highwood Green on it.

Page 28: 6.10 The SCATS retail facility, referred to under 'Pattenden Lane', closed a number of years ago.

Page 25 6.15 'The creation of large areas of green infrastructure to the north and north-east of the proposed developable area of the site within the masterplan would help conserve the rural and more tranquil feel of the scattered settlement'. The areas of green infrastructure have already reduced from the initial masterplan document and more of the site is now covered by housing allocation in the illustrative masterplan.

Page 29 The following have been omitted from the Site Constraints map: the railway with its two road bridges, one of which has a maximum height limit of 3.7 metres and the other which has a carriageway of 5.80 metres and two pedestrian paths measuring 0.90 and 0.70 metres wide. There is also no mention of the Marden Meadows SSSI. The key denotes K is existing drains/waterbodies however the map does not illustrate the main drainage ditches across the site.

Page 36: 9.5 Marden Neighbourhood Plan does not identify the need for a new primary school. It says that extra provision is needed (and that plans were drawn up in 2016) and that a new site may be needed in the future if population grows more.

Page 39 On both maps the church is referred to as Grade II listed, however the church is actually Grade I listed.

Page 43 In item 1 on the map the use of the word 'link' does not reflect that fact that the PROW is broken and that it is actually an informal path through the churchyard in its latter stage by the village. This can never be formally recorded as a footpath and won't ever be available to be upgraded to a cyclepath.

The footpath that is shown between numbers 12 and 15 is across the main railway line and there is no level crossing or safe means of crossing this railway line – the footpath literally crosses the lines.

Page 49 On the large masterplan drawing, the dedicated 'open space' appears to be an orchard to the northeast of the plan next to the reservoir.

The 15m buffer zone to protect Bridgehurst Woods which is an ancient woodland and is required in accordance with the submitted ecology report is not depicted on the masterplan.